



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One St. Andrews Plaza
New York, New York 10007*

June 3, 2020

By ECF

The Honorable Andrew L. Carter Jr.
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC#: _____
DATE FILED: 6/4/20

Re: United States v. Joseph Perlman, 19 Cr. 531 (ALC)

Dear Judge Carter:

The Government, with the defense's consent, respectfully requests an extension of the deadline to respond to defendant Joseph Perlman's motion for a reduced sentence.

On December 6, 2019, the Court sentenced Perlman to a term of imprisonment of one year and one day. On March 25, 2020, the Court adjourned Perlman's surrender date until July 7. (Dkt. 23). On May 26, 2020, Perlman filed a motion for a reduced sentence pursuant to 18 U.S.C. § 3582(c)(1)(A)(i). (Dkt. 27). At 2:48 p.m. today, the Court directed the Government to respond by 1 p.m. tomorrow, June 4, and directed Perlman to file any reply by 4:30 p.m.

Because Perlman is not serving his prison sentence and will remain at liberty until at least July 7, the Government respectfully requests more time to respond to his motion. Specifically, the Government proposes that it be permitted to respond by no later than June 10, 2020, with Perlman's reply, if any, due no later than June 17, 2020. The defendant, through counsel, consents to the requested extensions.

Respectfully submitted,

GEOFFREY S. BERMAN
United States Attorney

By: /s/
David Abramowicz / Michael McGinnis
Assistant United States Attorneys
(212) 637-6525 / 2305

cc: Defense counsel (by ECF)

SO ORDERED:

HON. ANDREW L. CARTER, JR.
UNITED STATES DISTRICT JUDGE 6/4/20